

### REMARKS

Paragraph 32 of the specification has been amended to correct a typographical error. No new matter has been added.

Independent claims 1, 15, and 20 are amended to clarify that the invention involves automatically creating a boundary scan description. Claims 2 and 19 are amended for consistency with claims 1 and 15. Claims 13 and 14 are canceled without prejudice. New claims 21 and 22 are added to claim the invention in alternative language. Independent claim 21 is thought to be patentable because the prior art is not understood to teach the claimed processor-based method for generating a BSDL file. The prior art does not appear to suggest the combination of limitations including generating a testbench from a netlist for the design without using a BSDL file that describes a boundary scan implementation in the design and automatically determining without user input, characteristics of the boundary scan implementation in the design from simulating the design with the testbench. A BSDL file is automatically generated from the simulation results.

Claims 1-12, 15-22 are pending in the application. Reconsideration and allowance of the application are respectfully requested.

The Office Action does not show that claims 1-20 are anticipated under 35 USC §102(b) by "Bruce" (US patent 5,517,637 to Bruce, Jr. et al.). The rejection is respectfully traversed because the Office Action fails to show that all the limitations of the claims are taught by Bruce, Jr.

Bruce appears to teach the opposite of the claimed invention. The claimed invention generates test vectors without use of a BSDL file, and from simulation results using the test vectors a boundary scan description is generated. Bruce first generates a BSDL file, and based on the BSDL file, tests and test parameters are chosen. Bruce apparently teaches that a BSDL file may be generated by a text editor (col. 3, l. 34-40) or a BSDL graphical generation interface (col. 3, l. 41-51). After the BSDL file is complete a test and test parameters may be selected based on the boundary scan description (col. 3, l. 64 – col. 4, l. 32). Thus, Bruce teaches that the user prepares a BSDL file for purposes of verifying the test architecture.

Claim 1, for example, uses the netlist to first prepare tests without use of a boundary scan description, and then generates the boundary scan description after simulation and using the simulation results. Thus, Bruce requires a BSDI file in order to perform a test, and claim 1 generates the test vectors without use of boundary scan description. Therefore, the Office Action does not show that Bruce anticipates independent claim 1 and, for at least the same reason, claims 15 and 20.

Claims 2 and 3 depend from claim 1 and are not shown to be anticipated for at least the reasons set forth above.

Claims 4-7 and 9 include limitations of using stored simulation result data to map input boundary cells to boundary scan access ports. These limitations are not apparent in the cited teachings of Bruce. Since specific elements of Bruce are not seen to correspond to the claim limitations, further explanation is requested if the rejection is maintained. Otherwise, the rejection should be withdrawn.

Claims 16-19 depend from claim 15 and are not shown to be anticipated for at least the reasons set forth above.

### CONCLUSION


Reconsideration and a notice of allowance are respectfully requested in view of the Amendments and Remarks presented above. If the Examiner has any questions or concerns, a telephone call to the undersigned is invited.

Respectfully submitted,

  
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I hereby certify that this correspondence is being deposited with the United States Postal Service as **first class mail** in an envelope addressed to: Commissioner for Patents, P.O. Box 1450 Alexandria, VA 22313-1450, on September 21, 2005.

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